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[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION TO LODGE
MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-
2 5(b), and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on
3 February 10, 2016 (Dkt. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
4 Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated
5 (collectively, "Plaintiffs") hereby move this Court for leave to lodge certain documents under seal
6 related to their motion to challenge Defendant's assertion of attorney-client privilege over one
7 certain document.

8 Under the terms of the Protective Order, Plaintiffs request leave to lodge three documents
9 under seal. First, Plaintiffs seek leave to lodge under seal Exhibit 1 to the Declaration of Matthew
10 S. Weiler ("Weiler Declaration"), which includes an email message that Defendant has designated
11 "Confidential" under the Protective Order. This email message is the document that is at issue in
12 Plaintiffs' motion to challenge, and it has been redacted by Defendant to indicate which portions of
13 the email message Defendant contends is protected by the attorney-client privilege. Second,
14 Plaintiffs seek leave to lodge Exhibit 3 of the Weiler Declaration under seal, which is an unredacted
15 version of the same email message. Third, Plaintiffs seek to any excerpts from, or specific
16 descriptions of, these documents in their motion. Plaintiffs have filed all of these documents, in
17 accordance with the Court's ECF system, with the instant motion.

18 Plaintiffs take no position concerning whether these materials should be sealed under the
19 standards governing sealed records. As set forth in their motion, it is Plaintiffs' position that the
20 challenged communications contained in the document at issue are not protected by the attorney-
21 client privilege.

22 Plaintiffs have filed redacted versions of these documents with the Court, and will serve un-
23 redacted versions of these documents on Defendant.

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1 DATED this 1st day of April, 2016

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Joseph R. Saveri

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2016 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Matthew S. Weiler